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ABSTRACT

The Bureau of Indian Affairs could save several millions of dollars and improve the operating efficiency of its boarding schools by consolidating them to make greater use of space and equipment, establishing policies for controlling expenditures, and having adequate staff and funds to maintain them properly. In 1977 the BIA operated 15 off-reservation and 57 on-reservation boarding schools for 18,562 students. An investigation into the operation of these schools found buildings and dormitories vacant, classrooms half-empty, expensive equipment unused, and funds mismanaged. Some schools were poorly maintained with some conditions presenting safety hazards. Boarding schools, both on and off the reservation, were for the most part ignoring BIA eligibility criteria and admitting students whose eligibility had not been verified. Six off-reservation schools visited were designed for 6,320 students; they had a combined enrollment of 2,654. The Bureau has been aware of underutilization of its off-reservation boarding schools but has been unable or unwilling to consolidate them because of Congressional and/or tribal actions. Information for this study was obtained through examination of reports and documents, visits to five BIA headquarters and area offices, interviews with BIA officials, school administrators, and tribal officials, and inspections of six off-reservation and four on-reservation boarding schools. Nine recommendations for improving the efficiency of the BIA boarding schools are given. (DS)

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REPOR[T] OF THE
COMPT[ROLLER GENERAL]
OF THE [UNITED STATES]

Bureau Of Indian Affairs Not Op[erating Boarding Schools] Efficien[tly]

The Bureau of Indian Affairs could save several millions of dollars and improve the operating efficiency of its boarding schools by

--consolida[ting them to make greater use] of space [and equipment,]

--establishi[ng policies for and controlling] boarding [school expenditures, and]

--having a[dequate staff and funds to] maintain [them properly.]

NOV 1978

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FEBRUARY 15, 1978

RC 010966

COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-114868

The Honorable Robert C. Byrd, Chairman
Subcommittee on the Department of
Interior and Related Agencies
Committee on Appropriations
United States Senate

Dear Mr. Chairman:

This report discusses how the Department of the Interior can improve its management of and save operating expenses in its boarding schools for Indian children. We made this review pursuant to your August 9, 1977, request to review several of the Department's Indian programs.

We discussed our findings with agency officials and their comments have been included. However, as your office requested, we have not obtained formal agency comments.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of the report until 10 days from the date of the report. At that time, we will send copies to interested parties and make copies available to others upon request.

Sincerely yours,

Comptroller General
of the United States

COMPTROLLER GENERAL'S REPORT
TO THE SUBCOMMITTEE ON
THE DEPARTMENT OF INTERIOR
AND RELATED AGENCIES, SENATE
COMMITTEE ON APPROPRIATIONS

BUREAU OF INDIAN AFFAIRS NOT OPERATING BOARDING SCHOOLS EFFICIENTLY

D I G E S T

During fiscal year 1977, the Bureau of Indian Affairs spent about $157 million to operate schools, including 15 off-reservation and 57 on-reservation boarding schools. (See pp.1 and 2.) These provide instruction and residential facilities for Indian elementary, middle, high school, and post-high school students who have inadequate day school opportunities or special education and/or social problems. According to the Bureau's records, boarding school students totaled 18,562 as of December 1977.

OFF-RESERVATION BOARDING SCHOOLS UNDERUTILIZED

The Bureau has not established appropriate required space per pupil criteria or optimum capacities for boarding schools. The six off-reservation schools GAO visited were designed for 6,320 students--a figure the Bureau maintains is no longer realistic. They have a combined membership of 2,654 but could accomodate 3,890 students comfortably. (See pp.3 and 4.)

At some of these schools there are:

--unused buildings and expensive equipment,
--partially full classrooms,
--vacant and closed dormitories and staff residence hall. (See pp.5, 6 and 12.)

The Bureau has not yet established staffing and funding criteria for boarding schools but has contracted with several organizations to develop these criteria by March 1978. Per-pupil costs and staffing at off-reservation boarding schools are greater than at on-reservation schools which are more fully utilized. Estimated fiscal year 1978 costs average $7,394 per pupil at the six

off-reservation schools and $3,824 at the four on-reservation schools reviewed. (See pp.9-12 and 18.)

The Bureau has been aware of underutilization in its off-reservation boarding schools since at least 1973, but has been unable or unwilling to consolidate them because of congressional and/or tribal actions. Numerous tribal representatives feel they are entitled to the schools by treaties and promises and that they offer a necessary alternative to public schools. They also believe the schools help preserve their tribal identity and Indian culture. (See pp.6-9.)

The Bureau plans to construct additional day schools in local communities. As a result, underutilization of off-reservation schools will likely become more severe. (See p.17.)

NEED TO VERIFY STUDENT ELIGIBILITY

The Bureau has established specific criteria and procedures for admitting Indian students to its boarding schools. Under these criteria, only students for whom public or Federal day schools are not available or those with specified education or social problems are eligible. (See pp.19 and 20.)

These criteria and procedures are, for the most part, ignored. Boarding schools, both on and off the reservation, are admitting students whose eligibility has not been verified. About 42 percent of the applications GAO reviewed at three Anadarko area schools did not have the approvals required by the Bureau's procedures. Applications reviewed at schools in the Phoenix and Navajo areas generally contained required approvals, but in many cases lacked any justification for eligibility or contained inappropriate justifications such as parental preference and refusal or unwillingness to attend public schools. (See pp.20 and 21.) As a result, underutilization of the Bureau's boarding schools could be even more severe than that indicated by GAO's review. The Bureau is reevaluating its boarding school admission criteria to determine if they are still appropriate. (See p.21.)

QUESTIONABLE PURCHASES

There are no adequate management controls or requirements to see that school expenditures are appropriate.

Numerous questionable purchases for agriculture, rifle team, and water safety programs had been made at one school. These programs failed to materialize or were canceled and none of the items had been used. (See pp.25-27.) Much scouting equipment and clothing purchased has never been used. (See pp.27 and 31.) Textbook expenditures at the school during the period of these questionable purchases were less than half of that requested by teachers. One teacher complained he had been forced to photocopy textbooks as a result. (See p.32.)

NAVAJO SCHOOLS IN POOR CONDITION

The four Navajo boarding schools GAO reviewed were in poor condition and contained broken windows, walls cracked from settling, inoperable showers and toilets, badly leaking roofs, and water-damaged ceilings. (See pp.37 and 38.)

The off-reservation boarding schools were in noticeably better condition. They had more staff and funds to properly maintain them. (See pp.38 and 39.)

The Navajo area uses a centralized maintenance system. This has resulted in inadequate supervision of maintenance personnel, cumbersome paperwork, and poor quality and timeliness of repairs. Supervisors and many of the workers are often located miles away from the schools for which they are responsible. Most Navajo school officials complained about the unresponsiveness and untimeliness of the current maintenance system. (See pp.40-42.)

RECOMMENDATIONS TO THE SECRETARY OF THE INTERIOR

To improve the operating efficiency of Bureau boarding schools, GAO recommends that the Secretary of the Interior direct the Assistant Secretary for Indian Affairs to:

--Instruct area offices, agency offices, and boarding schools to follow established eligibility criteria and admission procedures.

--Develop space utilization, staffing, and funding criteria for boarding schools that will insure efficient operation and that the educational needs of Indian children are met.

--Consolidate boarding schools into the minimum number of facilities needed to meet the above criteria.

--Dispose of unneeded facilities, buildings, and equipment in accordance with established procedures.

--Include provisions for linking procurements to specific educational needs in developing comprehensive education programs.

--Develop a system that will provide information with which to monitor program expenditures and/or determine need for detailed evaluations.

--Monitor and evaluate expenditures of funds at the school level periodically.

--Reevaluate staffing and funding of maintenance at Navajo area boarding schools and make adjustments necessary to insure that these facilities are maintained adequately.

--Implement plans to decentralize and simplify the Navajo area maintenance system.

FORMAL REVIEW AND COMMENTS NOT OBTAINED

At the request of the Chairman, Subcommittee on the Department of Interior and Related Agencies, Senate Committee on Appropriations, GAO did not submit this report to the Department of the Interior for formal review and comments. However, responsible agency officials were provided copies of the report and their informal comments have been considered. The officials agreed with GAO's recommendations and said they had begun plans to implement them.

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ABBREVIATIONS

GAO	General Accounting Office
BIA	Bureau of Indian Affairs

CHAPTER 1

INTRODUCTION

On August 9, 1977 the Chairman, Subcommittee on the Department of Interior and Related Agencies, Senate Committee on Appropriations, requested that we make a comprehensive review of some of the Bureau of Indian Affairs (BIA) programs and processes and report the results to him by February 15, 1978. This is one of a series of reports in response to that request. This report presents the results of our evaluation of the operational efficiency of BIA boarding schools.

INDIAN EDUCATION PROGRAMS

It has been recognized by Indian leaders and Government officials that education is a key element to solving many of the problems Indians face. In 1975 the Congress declared that a major national goal is to provide the quantity and quality of educational services and opportunities that will permit Indian children to compete in careers of their choice.

The Snyder Act of November 2, 1921 (25 U.S.C. 13), provides for the operation of boarding schools, dormitories, and day schools for Indian youth at the kindergarten, elementary, middle, high school, and post-high school levels. Title 25, Section 31.3 of the Code of Federal Regulations (1977) authorizes enrollment in BIA-operated schools to Indian children who live on Indian reservations under BIA jurisdiction, on other lands under BIA jurisdiction, or near the reservation when denial of such enrollment would have a direct effect on Bureau programs within the reservation, except when other appropriate school facilities are available to them. When it is determined that no appropriate local education agency is able to provide suitable free education for Indian children, BIA constructs and operates school facilities to educate them. It is general BIA policy to provide education as close to the children's homes as possible in day schools.

BIA also operates 15 off-reservation and 57 on-reservation boarding schools that provide instruction and residential facilities at the elementary, middle, high school, and post-high school levels. These schools are for Indian children who do not have suitable day school education opportunities in their communities or whose behavioral problems are too difficult for their families or existing community facilities to handle. These schools also provide a home living program to assist students in making social and cultural changes necessary for successful school adjustment.

The program for Indian students in BIA-operated schools is administered by the Office of Indian Education Programs and 12 area offices, with 82 subordinate agency offices located throughout the country. The Office of Indian Education Programs has offices in Washington, D.C., and at the Indian Education Resources Center in Albuquerque, New Mexico.

As of December 1977 the BIA student enrollment system was reporting an average daily membership of 41,548 elementary and secondary students in the 205 BIA-operated schools and other schools contracted by BIA to other groups. This total included 18,562 boarding students and 22,986 day students. BIA also operates 16 dormitories for 2,568 students attending public schools. In addition, BIA operates eight post-secondary schools with a total enrollment of 1,420.

Appropriations for Indian education during fiscal year 1977 totaled about $244 million, of which $157 million was appropriated for BIA school operations. The remaining $87 million was for assistance to Indians in non-Federal schools, adult education, and higher education.

SCOPE OF REVIEW

We examined reports and documents and interviewed BIA officials, BIA and public school administrators, and tribal officials concerning the operational efficiency of BIA boarding schools. We also reviewed applicable laws, regulations, policies, procedures, and practices at BIA headquarters, various area and local agency offices, and schools. We did not review the quality of the education provided by BIA boarding schools.

Our review was carried out at BIA headquarters offices in Washington, D.C., and Albuquerque, New Mexico; at the Anadarko, Oklahoma, area office; at the Phoenix, Arizona, area office; and at the Navajo area office located at Window Rock, Arizona. We visited the following on-reservation boarding schools located on the Navajo reservation: Chinle Elementary Boarding School at Many Farms, Many Farms High School, Kinlichee Elementary Boarding School, and Wingate High School. We also visited the following off-reservation boarding schools: Intermountain Intertribal School at Brigham City, Utah; Phoenix Indian School at Phoenix, Arizona; Sherman Indian High School at Riverside, California; Riverside Indian School at Anadarko, Oklahoma; Chilocco Indian School at Chilocco, Oklahoma; and Fort Sill Indian School at Lawton, Oklahoma. Our field work was done in October and November 1977.

At the conclusion of our work, we provided copies of our report to responsible Department of the Interior officials, and their oral comments have been considered.

CHAPTER 2

MORE EFFICIENT USE OF BOARDING SCHOOLS NEEDED

The six off-reservation boarding schools we visited are underutilized even when compared to BIA's most conservative capacity estimates. As a result, these schools vary significantly in per-pupil cost and ratio of students to staff. We observed totally unused dormitories and other buildings at some of these schools and half-empty classrooms at others. Also, expensive equipment is idle at some schools, and vacant buildings at one school have been damaged and defaced by vandals.

The four on-reservation boarding schools we visited appeared to be more fully used, but they, as well as some off-reservation boarding schools, are admitting students whose eligibility had not been adequately validated. As a result, ineligible students could be attending boarding schools and valid use of these schools could be less than what is indicated by current attendance.

OFF-RESERVATION BOARDING SCHOOLS UNDERUTILIZED

BIA has not yet established appropriate utilization criteria (required space per pupil) or optimum capacities for boarding schools. Our attempts to obtain such criteria from a number of other sources--such as the United States Office of Education, various private school associations, the National Education Association, the American Institute of Architects, and the Council of Education Facilities Planners--also proved futile. The Council of Education Facilities Planners advised us that it used to prescribe utilization criteria but had stopped the practice because its minimum standards tended to be used as maximums and because a variety of different education programs had emerged recently, each having vastly different space requirements.

At each of the off-reservation schools we visited, we were given several vastly different capacity figures. However, lacking firm utilization criteria, we could not determine which, if any, were appropriate. Typically, we were given the following capacity figures at each of the six schools: design capacity, maximum actual enrollment during the past 10-15 years, and BIA officials' estimates of capacity. Design capacity is the number of students the school was originally designed to accommodate. According to BIA officials, however, design capacity and historical enrollments

are not necessarily realistic because they usually date back many years during which educational philosophies, techniques, and resultant space requirements have changed significantly. BIA officials (school superintendents, principals, and/or area education officials) estimated capacity on the basis of the maximum number of students they believe the school could accommodate without overcrowding. These estimates, however, were based on various interpretations of overcrowding. Although most of the dormitory rooms we observed at these schools were approximately the same size, the officials made their estimates on the assumption that the dormitory rooms could each accommodate between two and four students.

The following table compares the memberships of the six schools at the time of our visit to the various capacity figures given us.

Utilization of Six Off-Reservation Boarding Schools Reviewed

School	Current membership (note a)	BIA officials' estimate of capacity	Design capacity	Maximum enrollment last 15 years
Phoenix	683	750	940	1,038
Sherman	652	800	960	1,063
Intermountain	775	1,240	2,600	2,522
Riverside	182	b/300	b/364	422
Chilocco	195	500	1,080	1,119
Fort Sill	167	300	376	330
Total	2,654	3,890	6,320	6,494

a/Average daily memberships as of late October or early November 1977, with the exception of Riverside, where average daily membership data was not available. Riverside membership is the actual number of students on the school's rolls on November 3, 1977.

b/Includes two dormitories with a combined capacity of 130 which were under construction at the time of our visit.

As shown on the table, the capacity estimates for each of the six schools varied significantly, and at none of the six did current membership approach design capacity or equal BIA officials' capacity estimates. The total current membership of the six schools comprised only 42 percent of their combined designed capacity and 68 percent of total capacity according to BIA officials' estimates.

The four on-reservation boarding schools we visited were used more fully than the off-reservation schools. In touring these four facilities, we did not observe unused dormitory space or other unused buildings. Typically, dormitories at these schools house four students in rooms or bays of approximately the same size as the off-reservation dormitory rooms we observed. The only exceptions were an honor dormitory at one school and a dormitory for seniors at another school, each having two students per room. We observed few empty desks or unused classrooms at the four schools, however, a few classrooms were being used for storage because there were no teachers for classes that would have been using the rooms.

During our tours of the six off-reservation schools, however, we observed totally unused buildings and partially full classrooms. For example, at Intermountain Intertribal School, Brigham City, Utah, 6 of 25 dormitories were vacant and closed. The school has 18 language arts classrooms set up to accommodate 25 students each; however, the classes we observed in session had between 10 and 20 students in attendance. This same degree of use was typical of most of the academic classes we observed at the school.

At Chilocco Indian High School, Chilocco, Oklahoma, we found two vacant and closed dormitories as well as the following unused facilities:

1. The entire third floor of a boys' dormitory (about 37 rooms) was vacant.

2. Another boys' dormitory was used only for meetings and boxing matches.

3. Two livestock barns had no livestock in or around them.

4. A staff resident hall was vacant and closed.

Most of the classes we observed in session at Chilocco appeared underutilized and were attended by a maximum of about 15 students. Besides the Intermountain School, which has already been discussed, we found some underutilized classrooms at three of the four remaining off-reservation boarding schools we reviewed: Sherman Indian High School, Riverside, California; Riverside Indian High School, Anadarko, Oklahoma; and Fort Sill Indian School, Lawton, Oklahoma.

We also found that area office officials questioned the need for the two new dormitories under construction at Riverside Indian High School. Each dormitory will be able to house about 65 students and will cost about $1.2 million each. Area facilities engineering officials advised us that they do not believe the two new dormitories are needed. According to area education officials, the area office division of education felt that only one new dormitory was needed and thus recommended against building a second. The officials said they did not believe both dormitories could be filled but that local tribes disagreed and persuaded the Commissioner (now titled Assistant Secretary) of Indian Affairs to approve construction of both dormitories. Tribal representatives at the school advised us that there is a large number of high school students in the vicinity who are not currently attending school and they believe new construction will attract some of these students back to school.

BIA has been aware of underuse in its off-reservation boarding schools since at least 1973 but has been unable or unwilling to consolidate them because of congressional and/or tribal opposition to closing existing schools. In August 1973 BIA announced plans to close the Intermountain School. Intermountain, located in Brigham City, Utah, was established in 1950 in an abandoned Army hospital as a high school for Navajo students, for whom a totally inadequate number of on-reservation schools was available at the time. Closure of the school was recommended by a Department of the Interior audit report and a BIA evaluation task force report issued earlier in 1973. The reports recommended closure because:

1. Enrollment had declined far below the level considered necessary for operational efficiency, and further declines were expected.

2. Schools had been constructed on the Navajo reservation which had space available to accommodate the Navajo students at Intermountain.

3. Return of Navajo students to on-reservation schools would be consistent with the tribe's policy of educating students on the reservation.

4. The cost of operating the school was high.

The planned closure of the school was met with opposition from Indian leaders, tribal councils, and Indian organizations, which, in January 1974, petitioned the Commissioner of Indian Affairs to fund a task force of Indian people to determine if the school should be closed. The Commissioner agreed to establish the task force (the All Indian Study Commission) and keep Intermountain open for another year. On the basis of preliminary application forms sent to every tribe, inquiries, and endorsements, the Study Commission concluded that by opening Intermountain to tribes other than Navajo, an enrollment of 800 could easily be reached for the 1974-75 school year. The Study Commission report, submitted to the Commissioner in September 1974, concluded that an intertribal school at Intermountain was "not only feasible, but absolutely necessary."

BIA's Indian Education Resources Center subsequently requested BIA's National Indian Training and Research Center and a private certified public accountant to analyze the Study Commission's report. Both concluded that the report did not contain enough data to support the Commission's recommendations.

In July 1974 the House Appropriations Committee's report on the Department of the Interior's fiscal year 1975 appropriations bill directed BIA to keep the school open. (H. Rept. No. 93-1209, 93d Cong., 2d sess. at page 30.) The Committee report concluded that the school was providing valuable services and also directed BIA to maintain an enrollment of at least 800 and spend at least $3,475,000 on the school during fiscal year 1975.

In October 1974, however, the Navajo Area School Board Association unanimously adopted a resolution calling for the withdrawal of Navajo students from Intermountain as well as funds provided to the school by BIA's Navajo area office. One of the reasons for withdrawal stated in the resolution was that available facilities on the Navajo reservation could easily accommodate Navajo students enrolled at Intermountain.

BIA officials advised us that they have not been able to comply with the congressionally mandated enrollment at Intermountain, even though BIA made a special exception to its school attendance boundary policy and recruited students

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favored consolidation of the schools but
do so because of tribal opposition.

We also discussed utilization of two of these schools (Riverside and Chilocco) with members of their respective tribal school boards. In both cases the members voiced strong opposition to consolidating or closing existing boarding schools because, in general, they feel BIA boarding schools offer a necessary alternative to public schools which they are entitled to by treaties and promises. They also generally exhibited a strong attachment to the schools and believed that the schools help preserve their tribal identity and Indian culture.

UNDERUTILIZATION RESULTS IN INEFFICIENCIES

BIA has not established funding and staffing criteria for boarding schools, and we were able to obtain only limited criteria from private school organizations and regional school accreditation associations. According to BIA education officials, however, the special educational and social problems common to Indian boarding school students require educational programs which are more heavily staffed and more costly than traditional educational programs. As a result, we were unable to conclude whether underutilization has resulted in overstaffing and overfunding of the six off-reservation boarding schools we reviewed.

We noted, however, a wide variance in per-pupil cost at the six schools. The per-pupil cost at these schools also tended to be considerably greater than that of the four on-reservation boarding schools we reviewed and found to be more fully utilized. (See following table.)

Estimated Fiscal Year 1978 Cost Per Pupil

at BIA Boarding Schools Reviewed (note a)

Off-reservation boarding schools (note b)	Per-pupil cost
Intermountain	$ 8,716
Phoenix	4,608
Sherman	5,275
Riverside	11,145
Chilocco	13,334
Fort Sill	9,892
All six schools combined	7,394
On-reservation boarding schools	
Kinlichee Elementary	3,834
Chinle Elementary Boarding School at Many Farms	3,557
Many Farms High	4,507
Wingate High	3,477
All four schools combined	3,824

a/Cost per pupil was computed by dividing the total annual budget for operating each school (including utilities and maintenance) by its average daily membership when available or by membership as of our visit in cases where average daily membership data was not available. Per-pupil costs are rounded to nearest dollar.

b/All off-reservation schools listed are high schools.

We also noted that staffing levels varied considerably among the six off-reservation schools and that they tended to have more teachers and total staff per pupil than did the four on-reservation schools. (See following table.)

Per-Pupil Staffing at Bureau Boarding Schools Reviewed

School	Pupils per teacher (note a)	Pupils per total staff (notes a and b)
Off-reservation (note c)		
Intermountain	9.1	2.2
Phoenix	15.8	4.0
Sherman	15.1	3.7
Riverside	7.5	1.5
Chilocco	7.5	2.0
Fort Sill	6.9	1.8
All six schools combined	10.8	2.7
On-reservation		
Kinlichee Elementary	17.3	3.6
Chinle Elementary Boarding School at Many Farms	21.5	4.6
Many Farms High	16.5	3.6
Wingate	14.3	5.1
All four schools combined	17.1	4.3

a/Based on staff on board and average daily membership or actual membership at the time of our visits in October and November 1977.

b/Total staff includes teachers, teacher aides, guidance counselors, dormitory workers, cafeteria staff, maintenance force, and custodial workers.

c/All off-reservation schools cited are high schools.

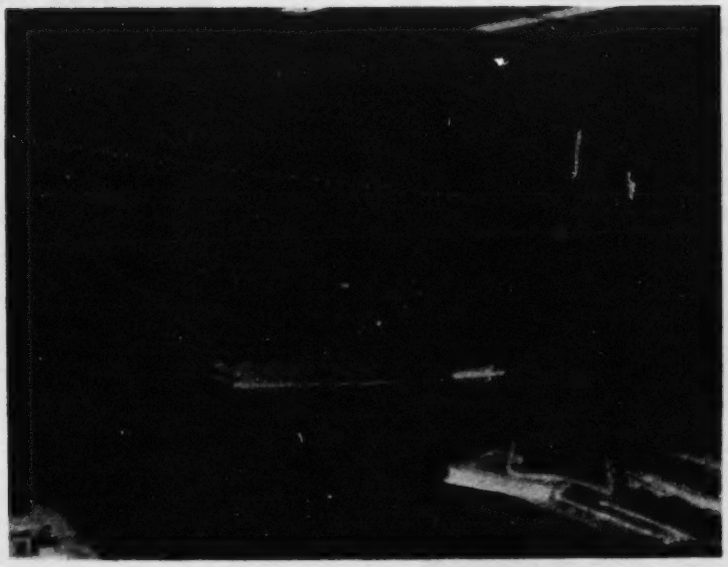
Underutilization of off-reservation boarding schools can also result in inefficient use and destruction of equipment and facilities. For example, in touring Chilocco Indian High School in Chilocco, Oklahoma, during November 1977, we found a fully equipped drafting room and a fully equipped woodworking shop, both of which are totally unused because of the lack of students. (See photos on p.13.) In a warehouse we found a number of musical instruments in good condition--such as cellos, violins, drums, woodwinds, and brass--which had been declared excess and were awaiting disposal. In the kitchen we found large walk-in freezers only partially used as well as a large bakery oven which is being replaced by a smaller unit because it is too large for current needs.

We found similarly underutilized equipment at Intermountain Intertribal School, Brigham City, Utah. For example, in touring this facility in November 1977, we noted four fully equipped but unused home economics classrooms as well as typing classes equipped for 20 with as few as 8 students using them.

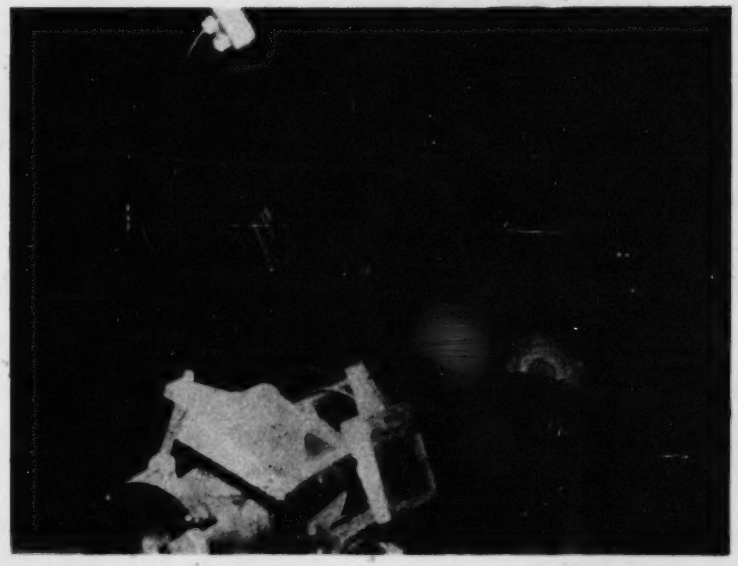
We also found that vacant buildings at the Chilocco School had been heavily damaged by vandals. A tour of a boys' dormitory vacant since 1972 revealed many broken windows, broken-down doors, destroyed furniture, mattresses strewn about the floor, door locks which had apparently been beaten or pried off, and manure on the floors from birds nesting in the building. (See photos on pp.14 and 15.) Our tour of another vacant dormitory revealed similar destroyed equipment and defaced property. In addition, roof leaks in the building had caused the plaster to fall from the ceiling in many of the upper floor rooms. The school's facility manager attributed the generally poor condition of these buildings to the fact that they are vacant. In our opinion, both buildings will likely require considerable repair in order to make them habitable again. In general, we found vacant facilities at the school to be vandalized and improperly maintained.

FACTORS TO CONSIDER IN CONSOLIDATING OFF-RESERVATION BOARDING SCHOOLS

On the basis of the underuse of the six schools we reviewed, we believe significant potential exists for consolidating BIA's off-reservation boarding schools and discontinuing operation of unneeded facilities. Consolidation should be planned on the basis of space utilization, staffing, and funding criteria that insure that the educational needs of Indian children are met. As yet, BIA has not formulated



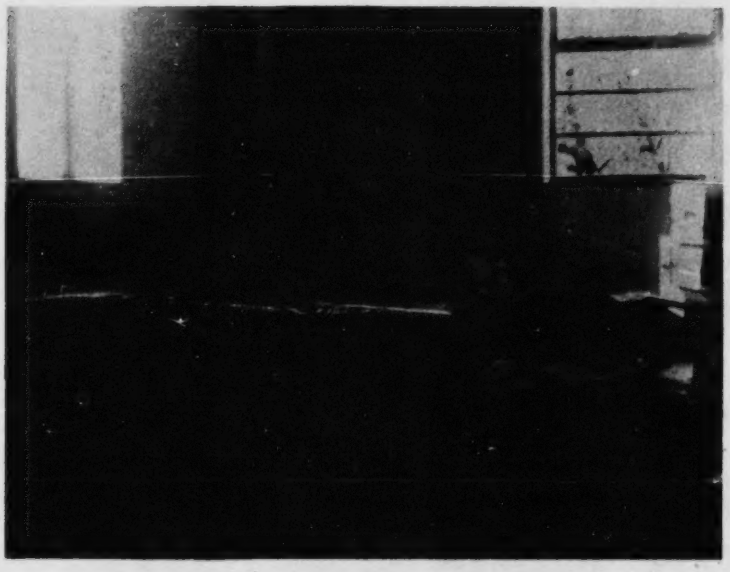
UNUSED DRAFTING ROOM AT CHILOCCO INDIAN HIGH SCHOOL.



UNUSED WOODWORKING SHOP AT CHILOCCO INDIAN HIGH SCHOOL.

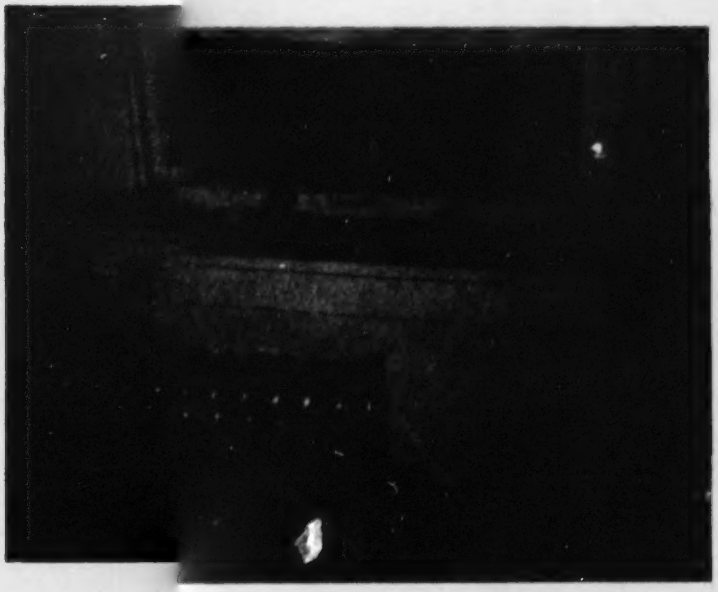
VACANT DORMITORY AT CHILOCCO INDIAN HIGH SCHOOL

EXTERIOR OF DORMITORY WHICH HAS BEEN VACANT SINCE 1972.



MATTRESSES STREWN ABOUT THE FLOOR.

VACANT DORMITORY AT CHILOCCO INDIAN HIGH SCHOOL



BROKEN WINDOW.

MANURE ON THE FLOOR FROM BIRDS NESTING IN THE BUILDING.

the necessary criteria. As a result, we were not able to quantify the extent to which off-reservation boarding schools could be consolidated or the savings which could accrue from closing unneeded facilities.

We found, however, that BIA spends millions of dollars annually operating these schools. The following table summarizes these costs for the six schools we visited. Obviously, several million dollars could be saved annually if consolidation resulted in closing only a few schools.

Fiscal Year 1978 Financial Program

for Off-Reservation Boarding Schools Reviewed

School	Education program cost	Facilities operation & maintenance cost	Total cost of school
Phoenix	$ 2,383,700	$ 763,900	$ 3,147,600
Sherman	2,619,100	820,300	3,439,400
Intermountain	5,430,000	1,325,000	6,755,000
Riverside	1,687,501	341,000	2,028,501
Chilocco	1,775,894	824,300	2,600,194
Fort Sill	1,290,100	362,000	1,652,100
Total	$15,186,295	$4,436,500	$19,622,795

It should be noted, however, that there could be additional costs associated with consolidation which could partially offset savings from closing unneeded schools or buildings. For example, boarding schools normally pay all or part of the cost of transporting students to and from school at the beginning and end of the school year and, in some cases, on certain holidays. As a result, consolidation could result in somewhat higher pupil transportation costs since some students would probably have to travel greater distances. Consolidation may also require renovation of existing facilities. As previously discussed, some vacant dormitories and other buildings have been severely vandalized and would require renovation before they could be used. It also seems reasonable to expect that some modification or modernization of existing facilities might be required.

We also noted that BIA policy provides for disposition of unneeded facilities. Under this policy, facilities BIA no longer needs are first offered to local tribes and school districts. If they have no use for the facilities, BIA then turns them over to the General Services Administration as excess real property for disposition in accordance with Federal Property Management Regulations.

It should also be noted that at the time of our review BIA was planning construction of 30 day schools as funds became available. Since distance from an available day school is one of BIA's criteria for boarding school attendance (see p.19), construction of additional day schools in the future should logically result in reduced enrollments at off-reservation boarding schools.

As previously mentioned, consolidation of off-reservation boarding schools could require some students to attend more distant schools. However, we noted that it is BIA policy to educate students as close to home as possible and to limit attendance at off-reservation boarding schools to students who reside within the boundaries of the area office in which the school is located. We checked to see if these policies are followed at the three off-reservation boarding high schools in the Anadarko area, and found that BIA generally ignores them. Of the 684 students who had been enrolled at these schools for the 1977-78 term by the time of our visits, 291 (or about 42 percent) came from other area office jurisdictions. In fact, students from 9 of the 11 other BIA areas were attending the three schools. The Office of Indian Education Programs advised us that it is reevaluating the attendance boundary policy, which was formulated in the 1950's, to determine if it is still appropriate.

Because our review was limited to determining the operational efficiency of BIA's boarding schools, we did not evaluate the possible effects that consolidation of off-reservation boarding schools might have on their educational effectiveness. We discussed this matter, however, with the Director of BIA's Office of Indian Education Programs in December 1977. He expressed concern that consolidation will perpetuate large schools which he believes are not as effective in educating students as smaller schools.

According to this official, current education theory favors smaller schools because public school districts have tried large, consolidated schools, and they have proved to provide less effective education than smaller

schools. As a result, he has proposed a system of smaller boarding schools of about 200-400 students, each concentrating on specialized education needs, such as vocational training, college preparation, and overcoming social problems. The Director also advised us that individual development of students is better when fewer students live in the same dormitory room. He said that, as a result, BIA has been trying to reduce the number of students per room, and its goal is eventually to have no more than two students per dormitory room, regardless of its size.

In our view, implementation of the Director's proposal for boarding schools need not preclude efficient use of existing off-reservation facilities. On the basis of BIA officials' estimates of optimum capacities given to us, it appears that some existing schools could be used efficiently with memberships of 200-400 students, as the Director has proposed. Schools with larger capacities could also be utilized efficiently by this number of students by making greater use of fewer buildings and disposing of the rest as excess real property. Once developed, space utilization, staffing, and funding criteria could be used to optimize the efficient use of facilities and resources and as a basis for identifying unneeded facilities and equipment. In addition, specialization in the schools could facilitate more efficient use of personnel, facilities, and equipment in vocational and business courses by consolidating the underutilized classes of this type which we found at some of the schools we visited. (See p.12.)

The Director agreed that BIA needs to utilize its boarding schools more efficiently and that appropriate staffing and funding criteria are essential to realization of the objective. He advised us that BIA has contracted with the National Institute for Education, the National Conference of State Legislatures, and the Education Commission of the States to develop these criteria by March 1978.

We also noted that BIA's Office of Administration is conducting a utilization survey of all BIA facilities, including boarding schools. At the time of our review, a number of agency and area offices had not responded to the survey. When complete data is received, it will be reviewed and analyzed to identify unneeded buildings and facilities for disposal. When we discussed the survey with Office of Administration officials in late November 1977, the responses were about 2 months overdue. The officials said they had made repeated requests for the survey data and they could not estimate when the remaining agency and area offices would respond.

NEED TO VERIFY ELIGIBILITY OF BOARDING SCHOOL STUDENTS

The boarding schools we reviewed are admitting students whose eligibility has not been verified according to BIA's admission procedures. BIA's manual (62 IMA 2.5.2 and 2.5.3) sets forth criteria and procedures for admitting Indian students to its boarding schools. To be eligible, an Indian student must meet one or more of the following education or social criteria.

Education criteria

1. Public or Federal day school is not available. Walking distance to school or bus transportation is defined as 1 mile for elementary children and 1-1/2 miles for high school students.

2. Special vocational or preparatory courses, not available locally, are needed to prepare students for gainful employment. Eligibility under this criterion is limited to grades 9 through 12 and post-high school grades 13 and 14.

3. Students who are retarded scholastically 3 or more years or who have pronounced bilingual difficulties, for whom no provision is made in available schools.

Social criteria

1. Rejected or neglected students for whom no suitable plan can be made.

2. Those from large families with no suitable home and whose separation from each other is undesirable.

3. Students with behavior problems too difficult for their families or existing community facilities to handle, who can benefit from the controlled environment of a boarding school without harming other children.

4. Those whose health or proper care is jeopardized by illness of other household members.

BIA's procedures require that a formal boarding school application, signed by the person with responsibility for the child, be submitted to the local BIA agency office. The

agency's Branch of Education must review the application and make an initial evaluation. If need for attending boarding school is solely educational, the Branch of Education must approve or disapprove the application on the basis of the education criteria. If the need is social, the application is to be forwarded to the agency's Branch of Welfare for evaluation and recommendation on the basis of the social criteria. Final authority to approve or reject the application rests with the agency superintendent when admission is to a boarding school within the same agency. When admission is to an off-reservation boarding school or to an on-reservation boarding school in another agency, the application must also be reviewed and approved by the area office Branch of Education and/or Branch of Welfare, depending on the factors involved.

At each of the 10 boarding schools visited, we reviewed between 15 and 124 random applications. Of the 297 application forms we reviewed at three Phoenix area schools (Phoenix, Intermountain, and Sherman), only 3 percent had not been approved. However, at the three Anadarko area schools we visited (Riverside, Chilocco, and Fort Sill), about 42 percent of the 321 applications reviewed did not have the required approvals.

We also reviewed approximately 88 applications at four Navajo area schools--Kinlichee, Many Farms High, Chinle Boarding School at Many Farms, and Wingate High. Although most of these applications were approved by an agency or school official, about 49 percent contained either no justification for eligibility or justification that did not conform to BIA's criteria. Inappropriate justifications were also noted on numerous applications at other schools. For example, in about 18 percent of the applications we reviewed at the three Anadarko schools, the primary justification appeared to be parental preference. Some of the justifications we found on applications were:

1. "She's a good student. No reason why she shouldn't attend. Probably more opportunities at boarding school."

2. "Student would not go to public school."

3. "Doesn't like public school."

4. "He is tall for his age and feels out of place with smaller students."

We discussed this matter with officials of the Anadarko and Navajo area offices and with the Director, Office of Indian Education Programs. The Anadarko officials advised us that a previous Area Director had instructed boarding schools in the area to ignore BIA admissions criteria and procedures, presumably in an effort to increase enrollments. The current Area Director said he rescinded these instructions and that Anadarko boarding schools should be complying with BIA procedures. As previously noted, however, we found that over 40 percent of the applications for the 1977-78 school year that we reviewed at Anadarko boarding schools did not have the required approvals. The registrar at one of these schools said she did not know that the instructions to ignore admissions criteria and procedures had been rescinded.

Navajo area officials told us that the tribe believes parental preference should be a criteria for boarding school admission and that they agree. They said that, as a result, the area office has been approving admissions on that basis, even though it does not strictly conform with BIA's official policy.

The Director of BIA's Office of Indian Education Programs agreed that boarding schools do not verify student eligibility and said this was because they are "hunting for students." He agreed, however, that BIA must correct this situation in order to plan effectively for the efficient use of its boarding schools. The Director said his office is reevaluating BIA's admission criteria, which were developed in the 1950's, to determine if they are still appropriate.

CONCLUSIONS

The off-reservation boarding schools we reviewed are underutilized and, as a result, are not operated efficiently. These schools vary significantly in per-pupil cost and ratio of students to staff. In general, they have higher per-pupil cost and more staff per pupil than on-reservation boarding schools, which are more fully utilized. Some of these schools have totally unused facilities, and partially full classrooms are typical. In some cases underutilization also has resulted in destruction of equipment and facilities.

BIA boarding schools, both on and off the reservation, are admitting students whose eligibility has not been verified according to established policies and procedures. On the basis of our review, it appears that BIA's criteria and procedures for boarding school admission are for the most part ignored. As a result, ineligible students could be attending

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e degree to which BIA's boarding schools d and/or streamlined depends on its required criteria and implementation of mit attendance at the schools. As a t able to quantify the savings which would ent utilization. The potential for is great. Should BIA close only two or onsolidation it would save several million Although there is likely to be some off- iated with consolidation (such as renova- ion of existing facilities and higher pupil ts), we do not believe that they will savings.

RECOMMENDATIONS TO THE SECRETARY OF THE INTERIOR

We recommend that the Secretary of the Interior direct the Assistant Secretary for Indian Affairs to:

--Instruct area offices, agency offices, and boarding schools to follow established eligibility criteria and admission procedures.

--Develop space utilization, staffing, and funding criteria for boarding schools that will insure efficient operation and that the educational needs of Indian children are met.

--Consolidate boarding schools into the minimum number of facilities needed to meet the above criteria.

--Dispose of unneeded facilities, buildings, and equipment in accordance with established procedures.

CHAPTER 3

QUESTIONABLE EXPENDITURES AT BIA BOARDING SCHOOLS

We found many questionable purchases at some BIA boarding schools we visited. We could not determine if the purchases were appropriate because BIA did not require and the schools did not have approved education programs or priorities to which we could compare the purchases. However, we noted that many of the questionable purchases were not being used and/or that other apparently higher priority items had not been purchased.

In addition, we noted that BIA had no monitoring system for its expenditures and that generally expenditures were not evaluated for appropriateness.

NEED FOR FORMALLY APPROVED EDUCATION PROGRAM AT BIA BOARDING SCHOOLS

BIA does not require its schools to develop formal education programs to identify and remedy factors impeding progress toward established goals. None of the 10 boarding schools we visited had education programs which were formally approved by agency or area offices.

During 1977 we issued two reports on programs for which BIA's Office of Indian Education Programs is responsible. One report, "Concerted Effort Needed to Improve Indian Education," (CED-77-24, Jan. 17, 1977) was a followup to our report, "Opportunity to Improve Indian Education in Schools Operated by the Bureau of Indian Affairs," (B-161468, Apr. 27, 1972). In these reports, we pointed out that comprehensive education programs are needed to improve effectiveness in BIA-operated schools. However, to date BIA has not required these programs. Such programs could also improve BIA school operational efficiency. A good comprehensive educational program should help prevent, and thus better control, inappropriate purchases.

A comprehensive program should:

--Provide some basis for school officials to set priorities on program needs and related budgeting.

--Provide approving authorities with some criteria to evaluate purchases for appropriateness.

--Hinder some school officials from purchasing unnecessary items.

--Preclude subsequent school officials from arbitrarily canceling or changing proposed or existing programs without adequate justification.

--Provide criteria to the agency, area, and BIA for judging how adequately school officials are following program goals and objectives.

--Cause schools to justify programs and purchases continually by the use of detailed and documented assessments of school and student needs.

We found that lack of approved education programs has resulted in thousands of dollars in questionable expenditures at 2 of the 10 boarding schools we visited. We found few questionable purchases at the other eight schools. The two schools have been able to make purchases for proposed or existing programs for which there was no definitive need. New programs are not always adequately justified because detailed needs assessments are not made by the schools or required by BIA. As a result, we found that some purchases are not used because changes in school management arbitrarily cancel proposed or existing programs. An approved education program would allow independent review of purchases by approving officials to assure conformance to detailed approved program objectives.

Following are several examples of such questionable expenditures at the Navajo area's Many Farms High School.

--A former acting principal informed us that in 1974 the area education office had acknowledged a need for vocational agriculture courses. Although a 1975 plan for the program was on file at the agency education office, there was no evidence that it had ever been approved. No detailed needs assessments were made. Vocational agriculture classes have been conducted for the past 3 school years but have been limited to classroom instruction without practical experiences. School officials said there were no curriculum guidelines for the classes and that they were begun haphazardly without proper planning. Purchases for vocational agriculture exceeded $30,000 from August 1976 through July 1977. School officials told us that other purchases had been made for this program, such as construction of a barn and corrals (see photos on p.28), but we were unable to locate purchase orders for them and thus we could not document if these items were purchased for vocational agriculture.

Although the current principal questioned the need for this program, he plans to use the purchases in future vocational agriculture classes. At the time of our visit, the school also owned 85 tons of alfalfa hay but had not acquired any livestock.

--Rifle ammunition costing $1,185 was ordered in March 1977 for a rifle team the principal said has not existed for several years and is not planned for the current school year program. Donated German-made target rifles, currently locked in the administration building, had been stored in one of the student dormitories. The principal does not anticipate reestablishing the rifle team. Agency officials canceled the order after we brought it to their attention.

--A water safety program had been proposed by the former acting principal but agency education officials could not locate any information on the program in their files. To implement this program, the school purchased 28 polystyrene blocks measuring approximately 17 feet by 4 feet by 1-1/2 feet each. Costing $2,530, the blocks were justified for "construction of portable floating docks for use in a water safety program at Many Farms Lake during spring, summer, and fall. Such program is part of school and BSA [Boy Scouts of America] water safety program." The current principal has no plans to implement the program. He said there is no documentation that the program existed or that it is needed. Meanwhile the polystyrene blocks, located in a dormitory storage room, require more than 2,500 cubic feet of storage space which school officials acknowledge is in short supply. (See photo on p.30.)

--Leather craft materials exceeding $7,300 were purchased from February through May 1977. (See photo on p.30.) Justification was to establish recreational instruction in leather and beading for school year 1977-78. The current principal has not established this program and it does not appear on the fall class schedule. He said he did not have an instructor and questioned the need for the program.

--Several thousand trees and shrubs, 8 to 24 inches high, were purchased for $2,372 from a Pennsylvania supplier in March 1977 for a campus beautification program:

Item	Quantity	Cost
Lombardy poplar	3,000	$ 690
Russian olive	6,000	1,200
Amur River privet	2,000	470
Hedge	20	12
Total	11,020	$2,372

The trees were planted and irrigated in a 50-feet by 150-feet fenced area prior to the planned transplanting throughout the campus. About one-third of the trees were still living during our November 1977 visit. (See photo on p.29.) We were informed that the trees died because BIA's facilities management personnel responsible for maintaining the school, considered irrigating them as wasting water.

In addition to these expenditures, we found that many purchases, for existing programs, were made which appeared to be questionable. Neither BIA nor its area offices require or have developed a system of setting priorities for education expenditures. Assigning priorities and budgeting should be facilitated with an approved education program. Setting priorities under a detailed, comprehensive education program would help guide basic expenditure decisions--for example, should textbooks and instructional materials be purchased before polystyrene blocks, rifle ammunition, and scouting equipment?

In the absence of a comprehensive educational program, large numbers of apparently low priority items or items of questionable need have been purchased. Obviously, without adequate controls and plans, items purchased can reflect what the requestor wants instead of what the school needs. Examples of such expenditures include:

--Scouting expenditures at Many Farms High School exceeded $56,000 from May 1976 through November 1977. Scout clothing alone accounted for over $15,000. Much of the equipment and clothing has never been used. In addition, the school paid $8,905 for the Chinle agency's share of salaries and field expenses of the council's Field Director and District Executive. We were informed in December 1977 that the agency has been assessed $40,586 for its share of scouting for

school year 1977-78. Explorer Scout fees being assessed are based on a list of 521 Explorer Scouts at Many Farms High School. The principal stated that he has counted about 169 names on the list who no longer attend his high school because they have either dropped out or graduated. He said only about 10 scouts are active members.

--School employees have used overtime and compensatory time to take Scouts on trips. A Navajo area policy allows overtime and compensatory time for scouting activities. Scouting equipment is locked in a dormitory storage area where the current principal attempts to control the scouting equipment that was purchased with school funds.

--Rock band instruments were obtained for Many Farms High School in July 1977. The former principal told us he purchased the instruments after discussions with dissident students who claimed "there's nothing to do around the school." As of December, the current principal was delivered 6 of 14 guitars and 2 of 3 amplifiers costing $3,442. He said he saw no need for the instruments, but that they would be used to some degree in music classes.

--In fiscal year 1977, Chilocco Indian School in Oklahoma spent over $27,000 for a backhoe and small front-end loader for a heavy equipment class of only five students. The school also justifies operating a 6,000 acre farm for six students enrolled in vocational agriculture. Actually, the school staff provides much of the labor on the Chilocco farm in the summer while being paid their regular salaries. The superintendent at Chilocco told us he had recently reduced the acreage being planted on the farm because he was not trying to maximize profit although the farm has an annual cash flow of about $100,000. Much of the farm proceeds have recently been spent for new farm equipment. We observed four self-propelled grain combines and 12 farm tractors at the school. During 1975 a combine costing over $21,000 and three tractors--one costing over $17,000 and two costing over $7,400 each--were purchased.

--At Chilocco, central heating and air-conditioning was installed during 1976 in a vandalized dormitory, vacant since 1972, on the basis that the dormitory

pages 28, 29, 30 blank.

might be used in the future. The Chilocco school is currently operating at only about two-fifths of the most conservative capacity estimates. (See p.4.)

On the other hand, we observed few purchases of instructional materials and equipment in our review of fiscal year 1977 purchase orders for the Chinle agency which includes Many Farms High School and the Chinle Boarding School at Many Farms. One teacher at Many Farms High School estimated that his department has received only 60 textbooks in the past 4 years for an average of 500 students annually. He said he has had to photocopy old textbooks.

During calendar year 1977, the time that most of the purchases at Many Farms were being made, purchases of textbooks and instructional materials costing $7,467 were documented, although an estimated $20,088 was requested by the teaching staff. The current principal told us that unapproved requisitions for textbooks and instructional materials generally are destroyed, and therefore we could not verify this information.

A comprehensive education program would also provide a better basis for agency and area officials to screen the types of questionable or low-priority purchase requests we noted during our review. The current purchasing system does not insure adequate screening for appropriateness of purchase orders, especially in the Navajo area. The school principal requisitions items and the education program administrator at the agency level has purchase approval authority. It is difficult for an authorizing official to determine if purchase requests are appropriate and justified because the authorizing official

--cannot always have first-hand knowledge of the requesting school's program,

--often is temporarily acting in the position and knows little if anything about the school's program, and

--has no criteria by which to determine if purchases are appropriate.

Navajo area officials agreed that boarding school purchasing system controls need to be tightened. They also agreed that a comprehensive education program would greatly improve their screening of questionable and/or low-priority requests by providing definitive criteria for determining the appropriateness of purchases.

The Director of BIA's Office of Indian Education Programs admits there is a need for formal education programs and that such programs would help control the type of questionable and/or low-priority expenditures we noted. He stated that the current BIA organizational structure prevents him from dealing directly with area offices and BIA schools. The Director believes each school and its school board should have the authority to outline student needs and design education programs to meet those needs. He further believes that the programs must be approved and monitored by the area office and his office but that local school officials should be held responsible for implementing the approved programs. In addition, the Director agrees that priorities need to be documented; however, he believes school administrators should be held responsible for staying within priority boundaries.

In commenting on the recommendations in our 1977 report to require comprehensive educational programs, the Department of the Interior stated that in the past BIA had what could be considered a comprehensive education program but that it was now in serious need of updating.

NEED FOR INDEPENDENT MONITORING AND EVALUATION OF EDUCATION EXPENDITURES

Although independent monitoring and evaluation of boarding schools is an established function of BIA's area offices, we found that all needed monitoring and evaluation has not been done. BIA said that such monitoring and evaluation would help control the type of questionable and low-priority purchasing by schools that we discussed previously.

In addition, we believe such monitoring and evaluation would help somewhat to control procurement irregularities. During our limited review of purchases, we found a few instances of procurement irregularities which have gone undetected and uncorrected. At Many Farms High School, BIA officials could not locate almost 800 square yards of carpeting costing $5,193 purchased for four dormitories and the cafeteria. Only one dormitory had been fully carpeted and a second one had been partially carpeted. Furthermore, payments were made acknowledging installation of about 6,600 square yards of carpeting material, about 1,700 square yards--installed at a cost of over $2,000--more than had been purchased. We estimated that only 4,100 square yards had been installed. Area officials stated they would look into the matter.

The Director of the BIA's Office of Indian Education Programs said that he recognizes the need for close monitoring and evaluation of BIA school operations. He told us that this should be done now, but he has not been allowed to fill positions needed to adequately monitor and evaluate operational efficiency and effectiveness because of a hiring freeze imposed by the Department of the Interior. We were advised that the Navajo area, where most questionable and irregular purchases were found, also does not evaluate school purchases because of the lack of staff, but it agrees that periodic evaluations are necessary.

In an effort to provide management with a tool to isolate at least extreme situations in need of evaluation, the Indian Education Resources Center has proposed a management information system which could assist in identifying potential problem areas requiring evaluation; however, the proposal has not been adequately developed by BIA according to the Director because of the lack of staff. Resources Center officials told us that this system could have helped highlight questionable purchases. For example, such a system can identify large amounts of low-priority purchases as opposed to textbook and instructional material purchases.

In both our 1972 and 1977 reports we recommended in part that BIA

--periodically evaluate program results on the basis of established milestones to permit necessary program redirection and

--develop a management information system that would provide meaningful and comprehensive program-oriented financial management reports.

The Department of the Interior generally agreed with our recommendation to monitor and evaluate how established goals are being implemented at all operating levels. It also commented that to be effective such a plan would require changes in BIA's structure. The Department stated that a recent reorganization of BIA's Office of Indian Education Programs had created one complete unit devoted to providing technical services and monitoring programs. Interior also stated that additional organizational changes will be needed and that as BIA moves into tribally run and operated programs its role will focus on monitoring and evaluation.

Interior also agreed with our recommendations to improve BIA's management information system and that BIA's education

program is in dire need of a modern computerized information system. Interior stated that BIA has set a high priority on system accountability and that plans are underway to achieve this goal.

We believe our current review of the appropriateness of certain BIA boarding school expenditures demonstrates the need to include monitoring and evaluating of boarding school operational expenditures as part of implementing our prior recommendations on evaluating and monitoring effectiveness of BIA schools.

CONCLUSIONS

In our opinion, BIA lacks adequate management controls and requirements for its boarding schools which could help prevent inappropriate purchases. As a result, many questionable purchases have been made. BIA should require formal education programs--developed by the school and approved by the agency, area, and/or central offices--to provide approving officials with definitive criteria for determining the appropriateness of purchases.

Also BIA needs to establish a more active and ongoing monitoring and evaluation program. This program should include procedures for periodic visits to individual schools and area offices and written reports on those visits. Such a program is needed to insure that (1) education activities are meeting student needs and (2) expenditures are appropriate.

The effectiveness of BIA's education efforts, including the appropriateness of expenditures, cannot be adequately monitored and controlled without an effective management information system.

RECOMMENDATIONS TO THE SECRETARY OF THE INTERIOR

We are repeating the essence of certain of our 1972 and 1977 recommendations to the Secretary of the Interior concerning the need to improve the effectiveness of education provided to Indian children. However, the following recommendations concern improving operational efficiency rather than program effectiveness. Specifically, we recommend that the Secretary of the Interior require the Assistant Secretary for Indian Affairs to:

--Include provisions for linking procurements to specific educational needs in developing comprehensive educational programs.

--Develop a management information system that will provide information with which to monitor program expenditures and/or determine need for detailed evaluations.

--Monitor and evaluate expenditure of funds at the school level periodically.

CHAPTER 4

NAVAJO BOARDING SCHOOLS NOT MAINTAINED ADEQUATELY

The four on-reservation boarding schools we visited, all in the Navajo area, are in generally poor condition due to lack of maintenance. However, the six off-reservation schools visited are in noticeably better condition. At the Navajo schools we noted that fewer resources were committed to maintenance, there was less direct supervision of maintenance staff, and the complexity of the Navajo area's centralized maintenance system also contributed to the poor maintenance.

POOR CONDITION OF NAVAJO BOARDING SCHOOLS

The four Navajo area boarding schools we visited are, for the most part, poorly maintained. In touring each school we noted a number of conditions requiring repair, some of which posed safety hazards to students. For example, at Kinlichee Elementary Boarding School we observed a broken window approximately 3 feet off the floor along a dormitory hallway, with large pieces of jagged glass still lodged in the frame. School officials said the window had been broken for several days. In the school library we observed a radiator with a missing section of pipe which was expelling steam into the room. School officials said this condition had existed for months. The steam, as well as water from roof leaks, had damaged the the walls. In a dormitory bathroom we observed a thermostat with exposed electrical wiring and clogged toilets which had apparently been clogged for some time.

School officials also pointed out an exterior wall in one classroom which recently had been patched to cover a hole which had existed for at least a year, exposing the room to the outside. School officials also advised us that a new roof had been put on one classroom building just before school opened in the fall, but that for months before the roof had leaked so badly that buckets had to be placed on the floor and students were assigned to empty them periodically during class.

We also found maintenance problems at the other three Navajo schools. Large numbers of broken windows and leaking sink faucets were common. We also observed several buildings with cracked exterior walls caused by settling of the buildings. At one school we observed several dormitory showers

BROKEN LIGHT BULB DANGLING OVER THE DOORWAY OF A CLASSROOM BUILDING AT CHINLE ELEMENTARY BOARDING SCHOOL.

that could not be used because the bottom of the walls had deteriorated, allowing water to leak into adjacent dormitory rooms. At another school we observed badly leaking roofs and where falling water damaged ceilings and a broken fluorescent light over one classroom building door with jagged pieces of broken bulb hanging from the fixture. (See photo above.)

In contrast to the Navajo schools, the off-reservation boarding schools we visited were in noticeably better condition. In touring these schools we observed few of the conditions found at the Navajo schools. With the exception of some vacant buildings at Chilocco discussed in chapter 2 (see p.12), these schools generally appeared to be well maintained and in need of few repairs.

FACTORS CONTRIBUTING TO POOR MAINTENANCE

One primary difference between maintenance at the Navajo boarding schools and at the off-reservation schools is the amount of resources committed. As shown in the following table, the facility area per maintenance person is

smaller at the off-re servation schools than at the Navajo schools and maintenan ce funding per square foot is higher.

Resourc es Committed to Maintenance at B oarding Schools Reviewed

	S quare feet per maintenance person	Estimated FY 1978 operating and maintenance funds per square foot
Off-reservation schools		
Chilocco	27,000	$1.79
Riverside	10,786	1.97
Fort Sill	15,613	1.93
Phoenix	17,196	1.85
Sherman	16,935	1.86
Intermountain	34,539	.91
All six combined	22,793	$1.42
On-reservation schools		
Many Farms High	31,221	$1.23
Chinle Boarding Scho l at Many Farms	31,221	1.50
Kinlichee Elementary	37,030	1.56
Wingate High	25,568	.90
All four combined	28,714	$1.23

We also noted th t of the three BIA areas we visited, the Navajo area spen the fewest dollars per square foot on operation and mai tenance of all types of facilities during each fiscal y ar, 1971 through 1976. Facility opera- tion and maintenance funding during this period averaged $1.08 per square foo in the Navajo area as compared to $2.12 per square foo BIA-wide.

We discussed the maintenance problems we observed at Navajo schools with area office and responsible local main- tenance officials. According to these officials, inadequate staffing and funding is their biggest problem. They acknow- ledged that a large backlog of required maintenance exists at the schools but said they are simply unable to keep up with requests for repairs

The shortage of maintenance personnel in the Navajo area has resulted in the establishment of a "self-help" program to supply needed maintenance. Under this program, education personnel at the schools perform needed repairs, and the facilities maintenance organization provides the materials and technical advice when necessary.

Some of the Navajo schools we visited had used this program extensively. For example, officials at Wingate High School estimated that dormitory personnel spent about 530 staff-hours during the summer of 1977 performing maintenance work on three of the school's six dormitories. This work included sandblasting and painting exterior walls, patching and painting interior walls, repairing or replacing door knobs, replacing broken or missing ceiling tiles, and boarding up broken windows for security reasons. In a letter of appreciation to the school's principal and staff, the local facility management foreman stated that without their help and manpower many of the projects could not have been completed. Officials at Chinle Boarding School estimated that 150 school employees spent almost 37,000 staff-hours repairing walls and painting during the summer of 1976 when the school moved to Many Farms, Arizona.

Lack of adequate supervision of maintenance personnel has also been a problem in the Navajo area. Unlike other areas, the Navajo area has a centralized maintenance system and organization. Under this system, one or two handymen responsible for minor repairs may be assigned to a school, but responsibility for most maintenance of schools and other BIA facilities rests with 10 work centers covering specified geographical areas. Each work center has one general foreman and two or three first-line foremen. The first-line foremen operate from designated locations within the work center boundaries and are responsible for supervising the handymen and overseeing maintenance at a number of facilities. These facilities, however, are often many miles from the first-line foreman's base of operation. For example, the first-line foreman for Kinlichee Elementary School is located about 60 miles away.

Officials of Kinlichee advised us that it has been very difficult to get requested maintenance performed. They said many of the conditions we noted in our visit had gone unrepaired for months, in some cases years, in spite of their repeated requests that repairs be made. They also told us that often they cannot locate the handyman assigned to the school and have no idea where he is.

We discussed this situation with area office maintenance officials in November and December 1977. The Area Operations Supervisor informed us that he had been experiencing a personnel problem with the first-line supervisor responsible for Kinlichee and that he was in the process of taking appropriate corrective action. He also told us that one maintenance problem has been the lack of adequate supervision of maintenance personnel resulting from the distances between schools and maintenance supervisors' locations.

We also found that the paperwork required by the Navajo maintenance system is voluminous and cumbersome. Under the system, the school submits work orders to the maintenance man (handyman) assigned to the school. If other than a very minor repair is requested, the work order must be forwarded through the work center to the area maintenance office for approval and returned to the cognizant work center to be scheduled and performed.

Maintenance officials at the BIA central office and Navajo area office agree that the system is cumbersome. Central office officials advised us that Navajo schools are the most poorly maintained BIA schools and attributed this primarily to their elaborate paperwork requirements. The officials we talked to at Navajo schools were unaminous in their criticism of the inordinate amount of time it takes to get maintenance performed.

The maintenance system at off-reservation boarding schools, which we found to be generally well maintained, is quite different from that used by the Navajo area. Each of these schools we visited had a permanent maintenance staff and a maintenance supervisor assigned to it who was responsible for all maintenance. At these schools, work orders are submitted to the maintenance supervisor who is responsible for insuring that the necessary repairs are completed satisfactorily and in a timely manner.

The General Services Administration recently completed an evaluation of BIA's planning, design, construction, and operation of school facilities in accordance with a Memorandum of Understanding and Agreement with the Department of the Interior. Its report to Interior concluded that operation and maintenance of school facilities is the most misunderstood, ineffectual, and underfunded of the BIA activities studied. The report also concluded that the Navajo centralized maintenance system was unresponsive and provided inadequate controls. The report recognized the Navajo area's plans to decentralize its maintenance

organization and recommended that these plans be implemented to make the system more responsive.

BIA maintenance officials advised us that the Navajo maintenance system will be decentralized. They said the decentralization had been planned for October 1, 1977, but has been delayed pending a decision on the personnel actions required. Under the new system, responsibility for maintenance will be returned to the five Navajo agency offices and agency superintendents will control work centers. Maintenance personnel assigned to the school will also be under the control of the school principal rather than a maintenance supervisor located miles away. BIA officials believe the planned decentralization will result in greater control over the maintenance function, closer supervision of local maintenance personnel, and fewer paperwork requirements, and that it will have an overall positive effect on the quality of maintenance. We were also advised by Navajo area officials in early December 1977 that implementation of the decentralized system had been rescheduled for June 1, 1978.

CONCLUSIONS

The Navajo boarding schools we visited are in generally poor condition and in need of repairs. Poor maintenance of these schools is due in part to the low level of resources committed. Maintenance officials claim they simply do not have enough staff and funds to keep up with needed repairs and, as a result, education personnel have been forced to assist in the maintenance effort. Also, we found conditions to be much better at off-reservation boarding schools where proportionately more staff and funds are committed to maintenance.

The centralized maintenance system used in the Navajo area has resulted in lack of adequate supervision of maintenance personnel and cumbersome paperwork requirements which, in our view, have also adversely affected the quality and timeliness of maintenance. BIA plans to replace the current system with a more decentralized one by June 1978. We agree with BIA's position that the new system will provide closer supervision and control over maintenance and will simplify paperwork requirements. In our opinion, proper implementation of the new system should help to improve the quality of school maintenance in the Navajo area.

RECOMMENDATIONS TO THE SECRETARY OF THE INTERIOR

We recommend that the Secretary of the Interior instruct the Assistant Secretary for Indian Affairs to:

--Reevaluate staffing and funding of maintenance at Navajo area boarding schools and make adjustments necessary to insure that these facilities are maintained adequately.

--Implement plans to decentralize and simplify the Navajo area maintenance system as soon as practical.

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